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September 21, 2000

Mr. John D. Gibson
Assistant Staff Director
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Dear Mr. Gibson:

This letter is in response to your letter of September 7, 2000, and a subsequent phone conversation with Neil Evans of your staff and the Burson-Marsteller/Young & Rubicam Political Action Committee's Assistant Treasurer, Ronna Sable Weber, on September 18, 2000.

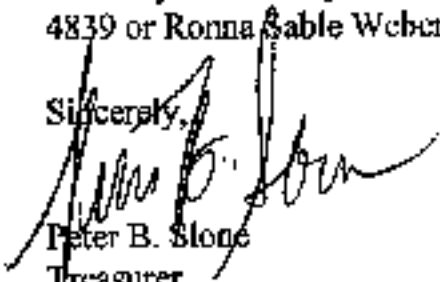
Your letter directed our PAC to file our 1999 Year End Report electronically. However, as we have indicated in many conversations and correspondence with you, this is not possible. In 1999 we filed our reports with the FEC via a computer disk and hard copy of our report. At some point during 1999, the FEC contacted us and asked that we not include a disk in our filing as it was unnecessary. We complied with this request and continued to send a hard copy of our report to the FEC. We did not receive a password allowing us to electronically submit our reports via the Internet until the spring of 2000. In addition, we have made several amendments to our 1999 Year End Report and the electronic filing of those amendments was not possible without electronically filing several earlier reports as well which the FEC had received in hard copy paper form.

To apply the electronic filing requirement retroactively seems unreasonable, and we would hope our paper submission of the 1999 Year End Report and our commitment to file all reports in the future, is satisfactory.

~~We submitted our Second Quarterly Report electronically via the Internet this year and fully intend to submit all future reports electronically and to be in full compliance with the law. For the record, however, we have had, and continue to have, great difficulty getting through our corporate computer-system-firewall in order to comply with this mandate. We will make every best effort to remediate that issue and satisfy your desire and our commitment to file all future reports electronically.~~

Should you have any further questions, please do not hesitate to contact me at (202) 530-4839 or Ronna Sable Weber at (202) 530-4836.

Sincerely,



Peter B. Stone
Treasurer



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-3

September 7, 2000

Peter Slone, Treasurer
Burson-Marsteller/Young & Rubicam
PAC (B-M/Y&R PAC) FKA Burson-
Marsteller PAC
1801 K Street, NW, Suite 901-L
Washington, DC 20006

Identification Number: C00201863

Reference: Amended Year End Report (7/1/99-12/31/99), dated 2/25/00

Dear Mr. Slone:

On August 16, 2000, you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

Your August 28, 2000 response is incomplete because you have not provided all the requested information. For this response to be considered adequate, the following information is still required.

-You have opted to file your reports electronically; however, you have failed to do so for the above referenced reporting period(s). Please be advised that if a committee chooses to file its reports electronically, it must continue to file all reports electronically for that calendar year. 11 CFR §104.18 Please file the 1999 Year End Report(s) electronically.

An adequate response must be received at the Commission by September 27, 2000. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

If you should have any questions related to this matter, please contact Neil Evans

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

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